

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**UNITED STATES OF AMERICA**

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**CASE NO. 2:16-CR-00378-DCN**

**v.**

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**MICHAEL SLAGER**

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**MOTION TO SEAL AND SUPPORTING MEMORANDUM**

The United States, by and through its undersigned Assistant United States Attorney, hereby moves this Court to seal its Motion *In Limine* Regarding Character Evidence of the Decedent Victim, in its entirety. The motion is submitted herewith. The motion details alleged acts of misconduct on the part of the victim in this case. The government submits evidence of these alleged acts should be excluded from the trial because such evidence would be irrelevant and highly prejudicial. Given the massive publicity that has attended the underlying events of this case, the sealing order would serve to avoid unnecessarily tainting the jury pool with the public disclosure of clearly inadmissible evidence, which might improperly suggest that the victim is less deserving of the protection of the law.

The Court has the inherent authority to seal the motion. *See Ashcroft v. Conoco, Inc.*, 218 F.3d 288, 302 (4th Cir. 2000); *Baltimore Sun v. Goetz*, 886 F. 2d 60 (4th Cir. 1988). Since the motion references specific alleged acts of misconduct throughout, redaction is not a feasible, though less drastic, alternative to sealing.

Based on the foregoing, the Government requests that the Motion In Limine Regarding Character Evidence of the Decedent Victim be filed under seal.

Respectfully submitted,

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UNITED STATES ATTORNEY

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Maryland Bar No. 04-1214-0250

February 10, 2017

**Non-Confidential Descriptive Index of the Documents at Issue:**

The single document at issue is a motion to exclude certain evidence of alleged misconduct on the part of the deceased victim in this case.

**Counsel's Certification of Compliance with This Rule:**

The undersigned certifies that he has complied with the procedural requirements of Rule 49.01 of the Local Criminal Rules for The United States District Court District of South Carolina (2014).

s/ Eric Klumb  
Eric Klumb (#01671)  
Assistant United States Attorney